

ROBINSON BROG LEINWAND GREENE GENOVESE & GLUCK P.C.

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VIA ECF and email

Hon. Lisa G. Beckerman
U.S. Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: In re 286 Rider Ave Acquisition LLC: Case No 21-11298 (LGB)

Dear Judge Beckerman,

Enclosed with this letter is a proposed order terminating the Purchase and Sale Agreement between 286 Rider Ave Acquisition LLC (“Debtor”) as seller and Vaja Group (“Vaja”) as buyer. The proposed order also authorizes Robinson Brog Leinwand Greene Genovese & Gluck P.C. (“Robinson Brog”) to release from its escrow the \$1,050,000 deposit previously submitted by Vaja.

Because of the delays in proceeding with the sale of the Debtor’s real property, Vaja has requested that Robinson Brog release from escrow Vaja’s deposit. Because of the continued uncertainty with respect to the sale of the property, the Debtor agrees with Vaja that it would be inequitable to continue holding onto the \$1,050,000 deposit and wishes to return the deposit to Vaja.

Unless Your Honor has any questions regarding the proposed order, we would respectfully request that the order be entered.

Respectfully submitted,

/s/ Fred B. Ringel

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